

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

STIPULATED MOTION AND
ORDER REGARDING SEALING
OF PLAINTIFFS' RESPONSE TO
AND AMAZON'S REPLY IN
SUPPORT OF AMAZON'S
MOTION TO CLAW BACK
PRIVILEGED MATERIAL AND
STRIKE REFERENCES THERETO
FROM PLAINTIFFS' CLASS
CERTIFICATION MOTION

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

STIP. MOT. & ORDER

RE SEALING OF OPP. TO AND REPLY ISO MTN. TO CLAW BACK DOCUMENTS

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)

1 The Parties have met and conferred with respect to Plaintiffs' upcoming Opposition to
2 Amazon's Motion to Claw Back Privileged Material ("Motion"). Plaintiffs anticipate that their
3 brief, declaration, and exhibits will quote from and/or describe in detail information that has been
4 designated as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon, including
5 Amazon's privilege log entries for the documents in question, related correspondence, and
6 Amazon's past declarations related to Amazon's privilege review. During a meet and confer on
7 Friday, March 28, 2025, Plaintiffs stated that, consistent with Amazon's public filing of the
8 Motion which described the documents in question, and attached public declarations that
9 included excerpts of the Parties' correspondence, Plaintiffs should be able to file their Opposition
10 publicly. Plaintiffs requested Amazon confirm this by Monday, March 31, 2025. In response,
11 Amazon requested that Plaintiffs file their Opposition under seal, so that Amazon can determine
12 whether any portions of the Opposition should remain under seal. Accordingly, in order to ensure
13 that such materials are treated appropriately under Amazon's request and the applicable
14 protective order, and to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and
15 10(g), and their respective counsel, hereby stipulate and agree to the following procedure for
16 filing and sealing in connection with Plaintiffs' Opposition to Amazon's Motion and Amazon's
17 Reply, subject to the Court's approval.

18 1. Pursuant to LCR 5(g)(2), Plaintiffs will provisionally file under seal its opposition
19 brief, declarations, exhibits, and all other evidence and declarations on which Plaintiffs rely
20 (collectively, "Opposition Papers") which contain material designated Confidential or Highly
21 Confidential-Attorneys' Eyes Only by Amazon.

22 2. Pursuant to LCR 5(g)(2), Amazon will provisionally file under seal its reply brief,
23 declarations, exhibits, and all other evidence and declarations on which Amazon rely
24 (collectively, "Reply Papers") which may contain material designated Confidential or Highly
25 Confidential-Attorneys' Eyes Only.

26 3. Within five business days of the filing of Amazon's Reply Papers, pursuant to
27 LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of the

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RE SEALING OF OPP. TO AND REPLY ISO MTN. TO CLAW BACK DOCUMENTS - 1
(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)

1 Opposition Papers and the Reply Papers, with necessary redactions, and (2) corresponding
2 motion(s) to seal pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or
3 under redaction) shall be the movant for purposes of any such motion(s) to seal associated with
4 the Parties' Supplemental Papers.

5 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

6 DATED April 1, 2025.

Respectfully submitted,

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STIP. MOT. & ORDER

RE SEALING OF OPP. TO AND REPLY ISO MTN. TO CLAW BACK DOCUMENTS - 2

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Attorneys for Defendant Amazon.com, Inc.

ORDER

IT IS SO ORDERED.

April 1, 2025

Dated



John H. Chun

United States District Judge

STIP. MOT. & ORDER

RE SEALING OF OPP. TO AND REPLY ISO MTN. TO CLAW BACK DOCUMENTS - 4
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